

***IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES***

Applicant: CHEN et al.

Title: VIRTUAL SHARED  
DATABASES

Appl. No.: 09/819,358

Filing Date: 3/28/2001

Examiner: Leroux, Etienne Pierre

Art Unit: 2161

Confirmation Number: 3309

**BRIEF ON APPEAL**

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Sir:

This Appeal Brief is being filed under the provisions of 37 C.F.R. § 41.37. This Appeal Brief is being filed together with a credit card payment form in the amount of \$1175.00, covering the 37 C.F.R. § 41.20(b)(2) appeal brief fee for a small entity (previously paid upon prior appeal) and appropriate extension fees. If this fee is deemed to be insufficient, authorization is hereby

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### **STATEMENT OF REAL PARTY IN INTEREST**

This Application names Jeane S Chen; Ephraim Feig; Dahlia P. Bona; Gregory J. Gould; and Harry E Gruber as inventors. On March 28, 2001, Jeane S Chen; Ephraim Feig; Dahlia P. Bona; Gregory J. Gould; and Harry E Gruber executed an assignment of the Application to Kintera Inc, having a place of business at 9605 Scranton Road Suite 240, San Diego, California. The assignment was recorded by the United States Patent and Trademark Office at Reel/Frame No. 011702/0950 on March 28, 2001.

### **STATEMENT OF RELATED CASES**

Appellant is not aware of any related cases that will directly affect, be directly affected by, or have a bearing on the present appeal.

### **JURISDICTIONAL STATEMENT**

The Board has jurisdiction under 35 U.S.C. § 134(a). The Examiner mailed a non-final rejection on December 27, 2007, setting a three-month shortened statutory period for response. The time for responding to the rejection expired on March 27, 2008. 37 C.F.R. § 1.134. A notice of appeal and a request for a three-month extension of time under 37 C.F.R. § 1.136(a)

was filed on June 26, 2008. The time for filing an appeal brief is two months after the filing of a notice of appeal. 37 C.F.R. § 41.37(c). The time for filing an appeal brief expires on August 26, 2008. The appeal brief is being filed on January 26, 2009, with a five-month extension of time under 37 C.F.R. § 1.136(a).

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## **TABLE OF AUTHORITIES**

### **CASES:**

<i>In re Bell</i> , 991 F.2d 781 (Fed. Cir. 1993)	9
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### **STATUTES:**

35 U.S.C. § 103(a)	6, 8
35 U.S.C. § 134(a)	2

### **OTHER AUTHORITIES:**

None

## **STATUS OF AMENDMENTS**

Appellant believes the most recent claim amendments, submitted in conjunction with the response filed on August 15, 2006, have been entered in full.

### **GROUND OF REJECTION TO BE REVIEWED**

The grounds of rejection to be reviewed in this appeal are:

- i) The rejection of claims 1, 5-9, 11, 12, 16, 20, 22, 26-29, 32, 33, 35-38, 40, 45, 47 and 53 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,506,393 to Ziarno (hereinafter “Ziarno”) in view of U.S. Patent No. 6,519,572 to Riordan et al (hereinafter “Riordan”).
- ii) The rejection of claims 10, 13-15, 17-19, 21, 30, 31, 34, 41-44, 48, 49 and 50-52 under 35 U.S.C. § 103(a) as being unpatentable over a combination of Ziarno and one or more other references.

### **STATEMENT OF FACTS**

1. The Examiner asserted that Ziarno discloses “one or more virtual data islands [first donation kettle, second donation kettle 100, Fig 1] partitioned inside the database [Fig 1, donation kettle network], each virtual data island storing client data for a specific client engaged in fundraising [account of charitable organization, col 5, lines 4-10], the client data containing one or more constituent records [col. 3, lines 59-65, col 9, lines 57-60], the one or more constituent records including information about individuals [information about a contributor and a donation, col 3, lines 59-65, account number of a contributor, col 9, line 8], the information stored in a plurality of fields [col 9, lines 1-10],

wherein each individual is assigned a unique identifier, the unique identifier for an individual being common across the virtual data islands [col 4, lines 21-25, first donation kettle 100 communicates with a second donation kettle 100]; a data pool having data from one or more constituent records stored in the one or more virtual data islands [tally of a credit card 145 donation, tally of a debit card 150 donation, tally of a cash donation or combinations thereof for a single contributor or a plurality of contributors, col. 5, lines 10-20], wherein results of the analysis are used in fundraising campaigns, one or more program codes for analyzing the data pool [software routing, col 5, lines 17-20, statistical software routine, col 5, lines 30-40].” Office Action dated December 27, 2007, pages 2-3.

2. The Examiner asserted that Riordan discloses “a linking table [col. 10, lines 01-15].” Office Action dated December 27, 2007, page 3.

## **ARGUMENT**

### **I. Rejection of Claims 1, 5-9, 11, 12, 16, 20, 22, 26-29, 32, 33, 35-38, 40, 45, 47 and 53**

#### **A. The Office Action fails to Establish a *Prima Facie* Case of Obviousness**

In the Office Action dated October 23, 2006, claims 1, 5-9, 11, 12, 16, 20, 22, 26-29, 32, 33, 35-38, 40, 45, 47 and 53 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ziarno in view of Riordan.

The Examiner has not made an adequate showing that independent claims 1, 22, 35, 36, 38 and 45 are rendered obvious by Ziarno in view of Riordan. More particularly, the Examiner has failed to cite any reference or any combination of references that teach at least a “unique identifier for an individual being common across the virtual data islands.”

#### **1. Requirements for a *prima facie* case of obviousness**

In *In re Rijckaert*, 9 F.3d 1531, 1532, (Fed. Cir. 1993), the Federal Circuit outlined the burden on the PTO as follows:

In rejecting claims under 35 U.S.C. 103, the examiner bears the initial burden of presenting a *prima facie* case of obviousness. *In re Oetiker*, 977 F.2d 1443, 1445, 24 U.S.P.Q.2d 1443, 1444 (Fed. Cir. 1992). Only if that burden is met, does the burden of coming forward with evidence or argument shift to the applicant. *Id.* “A *prima facie* case of obviousness is established when the teachings from the prior art itself would appear to have suggested the claimed subject matter to a person of ordinary skill in the art.” *In re*



*Bell*, 991 F.2d 781, 782, 26 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1993) (quoting *In re Rinehart*, 531 F.2d 1048, 1051, 189 U.S.P.Q. 143, 147 (CCPA 1976)). If the examiner fails to establish a *prima facie* case, the rejection is improper and will be overturned. *In re Fine*, 837 F.2d 1071, 1074, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988).

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some reasonable suggestion or motivation to modify the prior art reference or to combine reference teachings. Second, there must be a reasonable expectation of success of achieving the desired goals. Finally, the prior art references when combined must teach all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on the Applicant's disclosure. *In re Vaeck*, 947 F.2d 488 (Fed. Cir. 1991).

**2. The cited references fail to teach all the claim limitations.**

The cited references fail to teach or suggest at least this feature of the pending claims. The Examiner argues that Ziarno discloses the unique identifier by disclosing that a receipt is produced for a contribution by a contributor. Applicant respectfully disagrees with this interpretation of the disclosure of Ziarno.

The cited portion of Ziarno discloses:

Preferably, a receipt generator (a printer 821 and associated circuitry 823) is located on or near a donation kettle 100. In an alternate embodiment, the receipt generator may be located at a remote location. The receipt generator produces a receipt for a single donation or a plurality of donations. In one embodiment, a donation kettle 100 communicates, via a communication link, preferably an RF (radio frequency) communication link or an infra-red communication link, with the receipt generator. In another embodiment, a donation kettle 100 communicates donation and contributor information, via a communication link to terminal 120. Terminal 120 then communicates the contributor and donation information to the receipt generator. The communication consists of information about the contributor, the donation, the date, the intention for which the donation was given, and the like. The receipt generator processes the information about the contributor and the donation to generate a receipt. The receipt may be generated automatically by the receipt generator to be picked up by the contributor at or soon after visiting the donation kettle 100, or may be generated for mailing or faxing to the contributor. A contributor of a charitable organization may desire the receipt for tax purposes.

Ziarno, col. 9, lines 45-67.

Nothing in the cited portion of Ziarno teaches or suggests a unique identifier for an individual that is common across virtual data islands. The cited portion quoted above merely provides for a tax receipt to be generated for one or more donations at a single donation kettle. The receipt is generated either at the donation kettle site or at a remote location but, nevertheless, is still based on donations at a single donation kettle. Nothing in Ziarno teaches or suggests that the receipt is based on donations at multiple donation kettles. Furthermore, as

evidence of Ziarno lacking such a teaching or suggestion, nothing in Ziarno indicates how donations at multiple donation kettles would be directed to a single tax receipt. There is no indication that anything about the receipt or communication between the donation kettle and the remote terminal includes a unique identifier for an individual that is common across the various donation kettles.

In the latest Office Action, the Examiner argues that “a contributor is uniquely identified because the contributor is give an receipt for tax purposes.” Office Action dated November 27, 2007, page 10.

Appellant respectfully notes that this argument may have some validity if there was any teaching or suggestion in Ziarno that each contributor is provided with a single receipt. While Ziarno discloses that a tax receipt may be generated for “a single donation or a plurality of donations,” there is not teaching or suggestion in Ziarno that a single receipt is provided to a contributor for all contributions made by a donor at all the kettles.

A single receipt may be generated for all donations if all donations could be attributed to a single donor through, for example, a unique identifier. Ziarno teaches neither a single receipt for all donations nor a unique identifier.

Thus, Ziarno fails to teach or suggest at least a “unique identifier for an individual being common across the virtual data islands,” as recited in each of the independent claims.

Riordan fails to cure the deficiencies of the Ziarno. Riordan is cited by the Examiner as teaching a linking table. Riordan fails to teach or suggest the “unique identifier” of the present invention. In fact, there is no teaching or suggestion in Riordan of any “unique identifier.”

Accordingly, the Examiner has failed to establish a *prima facie* case of obviousness.

**B. The Office Action fails to Satisfy the Burden for Establishing a Motivation to Combine the References**

**1. Legal standard for obviousness**

Additionally, the courts have held that an invention is not obvious solely because it is composed of elements that are all individually found in the prior art. *In re Rouffet*, 149 F.3d 1350, 1357 (Fed.Cir. 1998). As described below, in this instance, the test is not met.

Further, as noted recently by the U.S. Supreme Court, when looking at the teachings of multiple references, it is to be determined:

... whether there was an apparent reason to combine the known elements in the fashion claimed by the patent at issue. To facilitate review, this analysis should be made explicit.

*KSR Int'l Co. v. Teleflex Inc.*, 127 S.Ct. 1727 (2007).

The Examiner argues that “KSR forecloses the argument that a specific teaching, suggestion or motivation is required to support a finding of obviousness.” Office Action dated November 27, 2007, page 9. Appellant respectfully disagrees with the Examiner’s position.

An invention is unpatentable as obvious if the differences between the patented subject matter and the prior art would have been obvious at the time of invention to a person of ordinary skill in the art. Rejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness. *KSR* at 1741 (2007) (quoting *In re Kahn*, 441 F.3d 977, 988 (Fed. Cir. 2006)). The *KSR* Court reaffirmed previous holdings that an invention “is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art.” *Id.* at 14, see also, *In re Rouffet* at 1357. Thus, in order to establish a *prima facie* case of obviousness, it is necessary for the Examiner to identify the reasons why a person of ordinary skill in the art would have combined the prior art elements in the manner claimed and why they would have a reasonable expectation of success. A proper analysis includes a consideration of the scope and content of the prior art; the level of ordinary skill

in the prior art; the differences between the claimed invention and the prior art; and objective evidence of nonobviousness.

In the present case, the Examiner identifies no clear suggestion or motivation (in any of the cited references) to combine any two or more references (let alone all five references as applied herein) to achieve Appellant's claimed invention. Specifically, the Examiner fails to provide any explicit analysis to support the "apparent reason to combine" the references. Rather, the Examiner merely makes the unsupported assertion that it would have been obvious to one of ordinary skill in the art at the time the invention was made to combine the references. Appellant respectfully submits that the Examiner's assertion is without merit.

It is clearly only with improper hindsight, and only with benefit of Appellant's disclosure, that there is any motivation to undertake the required modification of Ziarno to arrive at the present invention. Absent Appellant's disclosure, there is no motivation to combine the asserted references in order to arrive at Appellant's invention.

Thus, claims 1, 22, 35, 36, 38 and 45 are patentable. Claims 5-9, 11, 12, 16, 20, 26-29, 32, 33, 37, 40, 47 and 53 depend, either directly or indirectly, from allowable independent claims and are, therefore, patentable for

at least that reason, as well as additional patentable features when those claims are considered as a whole.

## **II. Rejection of Claims 10, 13-15, 17-19, 21, 30, 31, 34 41-44, 48, 49 and 50-52**

Claims 17, 42, 48 and 49 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ziarno in view of Riordan and further in view of U.S. Patent No. 6,539,446 to Chan. Claims 10, 13-15, 41, 43, 44 and 50-52 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Ziarno and Riordan, and further in view of U.S. Patent No. 6,308,201 to Pivowar et al. Claims 18, 30 and 31 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ziarno in view of U.S. Patent No. 5,665,952 to Ziarno. Claims 19, 21 and 34 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ziarno in view of U.S. Patent No. 6,535,871 to Romansky et al.

Claims 10, 13-15, 17-19, 21 and 52 depend from allowable claim 1; claims 30, 31 and 34 depend from allowable claim 22; claims 41-44 depend from allowable claim 38; and claims 48-51 depend from allowable claim 45. Thus, claims 10, 13-15, 17-19, 21, 30, 31, 34, 41-44, 48-52 are patentable for at least that reason, as well as additional patentable features when those claims are considered as a whole.

Respectfully submitted,

Date 26 January 2009

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**CLAIMS APPENDIX**

1. (Rejected): A database in a computer system linked to a network and configured to store client data, the computer system having one or more processors and one or more storage devices coupled to the one or more processors, the database comprising:

one or more virtual data islands partitioned inside the database, each virtual data island storing client data for a specific client engaged in fundraising, the client data containing one or more constituent records, the one or more constituent records including information about individuals, the information stored in a plurality of fields, wherein each individual is assigned a unique identifier, the unique identifier for an individual being common across the virtual data islands;

a data pool having data from one or more constituent records stored in the one or more virtual data islands;

a linking table including a compilation of unique identifiers of individuals whose records are in the one or more virtual data islands; and

one or more program codes for analyzing the selected data in the data pool, wherein results of the analysis are useable by the clients for fundraising.

2-4. (Canceled).

5. (Rejected): The database as recited in claim 1, wherein the network is the Internet.
6. (Rejected): The database as recited in claim 1, wherein the network is a wide area network.
7. (Rejected): The database as recited in claim 1, wherein the client is a nonprofit organization (NPO).
8. (Rejected): The database as recited in claim 1, wherein the client is a person.
9. (Rejected): The database as recited in claim 1, wherein the results of the analysis are used to identify potential donors likely to donate to one or more charities.
10. (Rejected): The database as recited in claim 1, further comprising an opt-in field indicating whether a client has elected to share data.
11. (Rejected): The database as recited in claim 1, further comprising a program code configured for statistical analysis of the selected data in the data pool.

12. (Rejected): The database as recited in claim 9, further comprising program codes for determining a probability of a charitable donation by an individual donor.

13. (Rejected): The database as recited in claim 10, wherein the opt-in field is set and updated with write-access to the field.

14. (Rejected): The database as recited claim 10, wherein the opt-in field accepts a multi-valued variable, each value corresponding to a data-sharing scheme.

15. (Rejected): The database as recited in claim 14, wherein the multi-valued variable allows clients to share data with others in different manners.

16. (Rejected): The database as recited in claim 1, further comprising means for automatically updating fields in a virtual data island if corresponding fields in other virtual data islands are updated.

17. (Rejected): The database as recited in claim 16, further comprising means for automatic notification of an update option, wherein when a field in one client's virtual data island is updated, a notification is sent to other participating clients that have a corresponding field.

18. (Rejected): The database as recited in claim 1, further comprising means for login access for donors to the individual constituent records in the virtual data islands, wherein the donors access their records and conduct financial transactions online.

19. (Rejected): The database as recited in claim 1, wherein the client is a political organization.

20. (Rejected): The database as recited in claim 1, further comprising a common unique identifier shared by individual constituent records across the virtual data islands.

21. (Rejected): The database as recited in claim 1, further comprising an opt-out field that indicates the data the client does not wish to share.

22. (Rejected): A method for analyzing a database residing in a computer system linked to a network, the computer system having one or more processors and one or more storage devices coupled to the one or more processors, comprising:

creating one or more virtual data islands partitioned inside the database, each virtual data island storing client data for a specific client engaged in fundraising, the client data containing one or more constituent records, the one or more constituent records including information about individuals, the

information stored in a plurality of fields, wherein each individual is assigned a unique identifier, the unique identifier for an individual being common across the virtual data islands;

creating a data pool having selected data from the one or more constituent records stored in the one or more virtual data islands;

creating a linking table including a compilation of unique identifiers of individuals whose records are in the one or more virtual data islands; and

analyzing the selected data in the data pool, wherein results of the analysis are useable by the clients for fundraising.

23-25. (Canceled).

26. (Rejected): The method as recited in claim 22, wherein the network is the Internet.

27. (Rejected): The method as recited in claim 22, wherein the network is a wide area network.

28. (Rejected): The method as recited in claim 22, further comprising identifying potential donors from the results of the analysis.

29. (Rejected): The method as recited in claim 22, further comprising determining, from the results of the analysis, a probability of a charitable donation by an individual donor.

30. (Rejected): The method as recited in claim 22, further comprising; accessing individual constituent records online; and conducting financial transactions.

31. (Rejected): The method as recited in claim 30, wherein the financial transactions include making a donation to one or more organizations.

32. (Rejected): The method as recited in claim 22, wherein the client is a nonprofit organization (NPO).

33. (Rejected): The method as recited in claim 22, wherein the client is a charitable organization.

34. (Rejected): The method as recited in claim 22, wherein the client is a political organization.

35. (Rejected): A computer-readable medium having computer-executable instructions for performing a method for analyzing a database residing in a computer system linked to a network, the computer system having one or more processors and one or more storage devices coupled to the one or

more processors, comprising:

creating one or more virtual data islands partitioned inside the database, each virtual data island storing client data for a specific client engaged in fundraising, the client data containing one or more constituent records, the one or more constituent records including information about individuals, the information stored in a plurality of fields, wherein each individual is assigned a unique identifier, the unique identifier for an individual being common across the virtual data islands;

creating a data pool having data from one or more constituent records stored in the one or more virtual data islands;

creating a linking table including a compilation of unique identifiers of individuals whose records are in the one or more virtual data islands; and  
analyzing data in the data pool.

36. (Rejected): A method for creating a database residing in a computer system linked to a network, the computer system having one or more processors and one or more storage devices coupled to the one or more processors, comprising;

creating one or more virtual data islands partitioned inside the database, each virtual data island storing client data for a specific client engaged in a fundraising campaign, the client data containing one or more constituent

records, the one or more constituent records including information about individuals, the information stored in a plurality of fields, wherein each individual is assigned a unique identifier, the unique identifier for an individual being common across the virtual data islands;

creating a linking table including a compilation of unique identifiers of individuals whose records are in the one or more virtual data islands; and

creating a data pool having data from one or more constituent records stored in the one or more virtual data islands.

37. (Rejected): The database as recited in claim 1, wherein the client is a charitable organization.

38. (Rejected): A system for storing and sharing client data, the system comprising:

a database;

a plurality of virtual data islands partitioned inside the database, each of the virtual data islands storing client data for a specific client engaged in one or more fundraising campaigns, the client data including one or more constituent records, the one or more constituent records including information about individuals, the information stored in a plurality of fields;

a data pool having data from one or more of the constituent records stored



in the one or more virtual data islands; and

at least one program code for analyzing data in the data pool, wherein results of the analysis are shared with clients who have data in the data pool,

wherein each individual is assigned a unique identifier, the unique identifier for an individual being common across the virtual data islands, the system further comprising a linking table including a compilation of unique identifiers of individuals whose constituent records are stored in the one or more virtual data islands.

39. (Canceled).

40. (Rejected): The system as recited in claim 38, further comprising a master island residing in the database and containing a compilation of the fields in the one or more virtual data islands.

41. (Rejected): The system as recited in claim 38, further comprising means for allowing a client to update constituent records stored in their virtual data island.

42. (Rejected): The system as recited in claim 41, further comprising means for automatically updating a field in a virtual data island.

43. (Rejected): The system as recited in claim 38, wherein each virtual data island includes an opt-in field indicating whether a client has elected to share data.

44. (Rejected): The system as recited in claim 43, wherein if the client has elected to share data, data from constituents records in the client's virtual data island are stored in the data pool and the client has access to the results of the analysis of data in the data pool.

45. (Rejected): A method of storing and sharing client data comprising:

providing a database;

partitioning the database into a plurality of virtual data islands, each of the virtual data islands storing client data for a specific client engaged in one or more fundraising campaigns, the client data including one or more constituent records, the one or more constituent records including information about individuals, the information stored in a plurality of fields;

creating a data pool having data from one or more of the constituent records stored in the one or more virtual data islands; and

analyzing data in the data pool, wherein results of the analysis are shared with clients who have data in the data pool,

wherein each individual is assigned a unique identifier, the unique identifier for an individual being common across the virtual data islands, the method further comprising creating a linking table including a compilation of unique identifiers of individuals whose constituent records are stored in the one or more virtual data islands.

46. (Canceled).

47. (Rejected): The system as recited in claim 45, further comprising creating a master island residing in the database, the master island containing a compilation of the fields in the one or more virtual data islands.

48. (Rejected): The system as recited in claim 45, further comprising allowing a client to update constituent records stored in their virtual data island.

49. (Rejected): The system as recited in claim 48, further comprising automatically updating a field in a virtual data island if the corresponding field in one or more other virtual data islands is updated.

50. (Rejected): The system as recited in claim 45, wherein each virtual data island includes an opt-in field indicating whether a client has elected to share data.

51. (Rejected): The system as recited in claim 50, wherein if the client has elected to share data, data from constituent records in the client's virtual data island are stored in the data pool and the client has access to the results of the analysis of data in the data pool.

52. (Rejected): The database as recited in claim 10, wherein if the client has elected to share data, data from constituent records in the client's virtual data island are stored in the data pool and the client has access to the results of the analysis of data in the data pool.

53. (Rejected): The database as recited in claim 1, further comprising a master island containing a compilation of the fields in the one or more virtual data islands.

**CLAIM SUPPORT AND DRAWING ANALYSIS APPENDIX**

1. A database in a computer system linked to a network and configured to store client data (Page 6, lines 10-14; Figure 1), the computer system having one or more processors (Page 4, lines 6-23) and one or more storage devices coupled to the one or more processors, the database comprising:
  - one or more virtual data islands partitioned inside the database, each virtual data island storing client data for a specific client engaged in fundraising (Page 6, line 6 – Page 7, line 5; Figure 1), the client data containing one or more constituent records, the one or more constituent records including information about individuals, the information stored in a plurality of fields (Page 6, line 6 – Page 7, line 5; Figure 1), wherein each individual is assigned a unique identifier, the unique identifier for an individual being common across the virtual data islands (Page 6, line 15 – Page 7, line 10);
  - a data pool having data from one or more constituent records stored in the one or more virtual data islands (Page 9, line 4 – Page 10, line 2);
  - a linking table including a compilation of unique identifiers of individuals whose records are in the one or more virtual data islands (Page 7, line 5 – Page 8, line 6); and
  - one or more program codes for analyzing the selected data in the data

pool, wherein results of the analysis are useable by the clients for fundraising (Page 11, lines 3-23).

22. A method for analyzing a database residing in a computer system linked to a network, the computer system having one or more processors (Page 4, lines 6-23; Page 6, lines 10-14; Figure 1) and one or more storage devices coupled to the one or more processors, comprising:

creating one or more virtual data islands partitioned inside the database, each virtual data island storing client data for a specific client engaged in fundraising (Page 6, line 6 – Page 7, line 5; Figure 1), the client data containing one or more constituent records, the one or more constituent records including information about individuals, the information stored in a plurality of fields (Page 6, line 6 – Page 7, line 5; Figure 1), wherein each individual is assigned a unique identifier, the unique identifier for an individual being common across the virtual data islands (Page 6, line 15 – Page 7, line 10);

creating a data pool having selected data from the one or more constituent records stored in the one or more virtual data islands (Page 9, line 4 – Page 10, line 2);

creating a linking table including a compilation of unique identifiers of individuals whose records are in the one or more virtual data islands (Page 7, line 5 – Page 8, line 6); and

analyzing the selected data in the data pool, wherein results of the analysis are useable by the clients for fundraising (Page 11, lines 3-23).

35. A computer-readable medium having computer-executable instructions for performing a method for analyzing a database residing in a computer system linked to a network (Page 4, lines 6-23; Page 6, lines 10-14; Page 13, line 29 – Page 14, line 4; Figure 1), the computer system having one or more processors and one or more storage devices coupled to the one or more processors, comprising:

creating one or more virtual data islands partitioned inside the database, each virtual data island storing client data for a specific client engaged in fundraising (Page 6, line 6 – Page 7, line 5; Figure 1), the client data containing one or more constituent records, the one or more constituent records including information about individuals, the information stored in a plurality of fields (Page 6, line 6 – Page 7, line 5; Figure 1), wherein each individual is assigned a unique identifier, the unique identifier for an individual being common across the virtual data islands (Page 6, line 15 – Page 7, line 10);

creating a data pool having data from one or more constituent records stored in the one or more virtual data islands (Page 9, line 4 – Page 10, line 2);

creating a linking table including a compilation of unique identifiers of individuals whose records are in the one or more virtual data islands (Page 7,

line 5 – Page 8, line 6); and

analyzing data in the data pool (Page 11, lines 3-23).

36. A method for creating a database residing in a computer system linked to a network, the computer system having one or more processors and one or more storage devices coupled to the one or more processors (Page 4, lines 6-23; Page 6, lines 10-14; Figure 1), comprising;

creating one or more virtual data islands partitioned inside the database, each virtual data island storing client data for a specific client engaged in a fundraising campaign (Page 6, line 6 – Page 7, line 5; Figure 1), the client data containing one or more constituent records, the one or more constituent records including information about individuals, the information stored in a plurality of fields (Page 6, line 6 – Page 7, line 5; Figure 1), wherein each individual is assigned a unique identifier, the unique identifier for an individual being common across the virtual data islands (Page 6, line 15 – Page 7, line 10);

creating a linking table including a compilation of unique identifiers of individuals whose records are in the one or more virtual data islands (Page 7, line 5 – Page 8, line 6); and

creating a data pool having data from one or more constituent records stored in the one or more virtual data islands (Page 9, line 4 – Page 10, line 2).



38. A system for storing and sharing client data (Page 6, lines 10-14; Figure 1), the system comprising:

- a database (Page 6, line 6 – Page 7, line 5; Figure 1);
- a plurality of virtual data islands partitioned inside the database (Page 6, line 6 – Page 7, line 5; Figure 1), each of the virtual data islands storing client data for a specific client engaged in one or more fundraising campaigns (Page 6, line 6 – Page 7, line 5; Figure 1), the client data including one or more constituent records, the one or more constituent records including information about individuals, the information stored in a plurality of fields (Page 6, line 6 – Page 7, line 5; Figure 1);
- a data pool having data from one or more of the constituent records stored in the one or more virtual data islands (Page 9, line 4 – Page 10, line 2); and
- at least one program code for analyzing data in the data pool, wherein results of the analysis are shared with clients who have data in the data pool (Page 11, lines 3-23),

wherein each individual is assigned a unique identifier, the unique identifier for an individual being common across the virtual data islands (Page 6, line 15 – Page 7, line 10), the system further comprising a linking table including a compilation of unique identifiers of individuals whose constituent

records are stored in the one or more virtual data islands (Page 7, line 5 – Page 8, line 6).

45. A method of storing and sharing client data (Page 6, lines 10-14; Figure 1) comprising:

providing a database;

partitioning the database into a plurality of virtual data islands, each of the virtual data islands storing client data for a specific client engaged in one or more fundraising campaigns (Page 6, line 6 – Page 7, line 5; Figure 1), the client data including one or more constituent records, the one or more constituent records including information about individuals, the information stored in a plurality of fields (Page 6, line 6 – Page 7, line 5; Figure 1);

creating a data pool having data from one or more of the constituent records stored in the one or more virtual data islands (Page 9, line 4 – Page 10, line 2); and

analyzing data in the data pool, wherein results of the analysis are shared with clients who have data in the data pool (Page 11, lines 3-23),

wherein each individual is assigned a unique identifier, the unique identifier for an individual being common across the virtual data islands (Page 6, line 15 – Page 7, line 10), the method further comprising creating a linking table including a compilation of unique identifiers of individuals whose

constituent records are stored in the one or more virtual data islands (Page 7,  
line 5 – Page 8, line 6).

**MEANS OR STEP PLUS FUNCTION ANALYSIS**

**APPENDIX**

None.

**EVIDENCE APPENDIX**

No evidence is relied upon in this brief.

**RELATED CASES APPENDIX**

There are no orders or opinions in any related cases.